

## UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America

v.

Pierce Matthew Morrow

Case No.

6:18-MJ- 00014 - JR

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of on or before January 18, 2018 in the county of Deschutes in the  
District of Oregon, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 2252A (a)(2) and (a)(5)

Possession, Distribution and Receipt of Child Pornography

This criminal complaint is based on these facts:

The attached affidavit of FBI SA Damara Schiltz which is incorporated herein

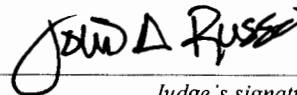
☒ Continued on the attached sheet.

*Complainant's signature*

Damara Schiltz, Special Agent FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 01/18/2018

*Judge's signature*City and state: Eugene, Oregon

Jolie A. Russo, United States Magistrate Judge

*Printed name and title*

DISTRICT OF OREGON, ss:       AFFIDAVIT OF DAMARA SCHILTZ

**Affidavit in Support of a Criminal Complaint and Arrest Warrant**

I, Damara Schiltz, being duly sworn, do hereby depose and state as follows:

**Introduction and Agent Background**

1.       I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been employed in this capacity since July 2011. I am currently assigned to the Portland Division at the Eugene, Oregon Resident Agency. My responsibilities include the investigation of federal criminal offenses. Prior to my job as a Special Agent with the FBI, I worked in the capacity of a staff operations specialist for the FBI analyzing criminal and counter terrorism matters.

2.       I submit this affidavit in support of criminal complaint and arrest warrant for an Pierce Matthew Morrow. As set forth below, I have probable cause to believe that Pierce Matthew Morrow committed violations of Title 18, United States Code, Sections 2252A (a)(2) and (a)(5)(B), receipt, distribution, and possession of child pornography.

3.       This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own knowledge and knowledge obtained from other individuals specifically SA Travis Welter, the lead case agent in this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

**Applicable Law**

4.       Title 18, United States Code, Section 2252A(a)(1) prohibits a person from

knowingly transporting or shipping child pornography, as defined in 18 U.S.C. § 2256(8), using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer. Section 2252A(a)(2) prohibits a person from knowingly receiving or distributing any child pornography that has been mailed, shipped, or transported by any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer. Section 2252A(a)(5)(B) prohibits a person from knowingly possessing or accessing with intent to view any child pornography that has been mailed, shipped, or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

5. Title 18, United States Code § 2256(2) defines “sexually explicit conduct” as actual or simulated sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; bestiality; masturbation; sadistic or masochistic abuse; or the lascivious exhibition of the genitals or pubic area of any person.

6. The term “minor” is defined in 18 U.S.C. § 2256(1) as any person under the age of 18 years.

#### **Statement of Probable Cause**

7. SA Travis Welter, FBI Bend, has been involved in an investigation concerning the receipt, possession and distribution of child pornography by an individual in a Kik chat room. The investigation began with the Salt Lake City FBI. Beginning on July 11, 2017 through January 3, 2018, an FBI undercover employee (hereinafter “UCE”) from the Salt Lake City Field

Office, initiated the application Kik from an undercover computer. The FBI UCE was using a Kik username of a known child pornographer who gave the FBI consent to access this account for the purpose of identifying other Kik users engaged in the sexual exploitation of children. During the time frame the UCE was invited into a Kik group named "Kid Porn Trade," which suggested possible interest in child pornography.

8. An individual using Kik username "665and1half," display name "Wolf Wrath" is a member of the Kik chat group called "Kid Porn Trade," which was later renamed "Ancient Greeks." Individuals in this group posted images, videos and links that contained child pornography and/or embedded child pornography in the group chat. Kik user "665and1half" was identified as a member of this group from approximately July 11, 2017 through January 3, 2018. Based on Kik records, SA Welter was able to determine "665and1half" registered an account on March 9, 2017 at 07:06:23 UTC, using an Apple iPhone.

9. On approximately November 14, 2017, at 23:27 UTC, Kik username "665and1half" posted images consistent with child pornography and the following comments: "Baited a few boys" and "But they got cat fished."

10. On January 2, 2018, at approximately 04:26 UTC, Kik user "665and1half" posted three images consistent with child pornography and the following comment: "Anyone know where to find more pictures from this picture set?" The posted images were of a prepubescent male and female. The male was completely naked and the female was naked from the waist down. The male was attempting to engage in sexual intercourse with the female. There was also sexual touching in the images.

11. On January 8, 2018, SA Welter reviewed Kik sessions of "665 and 1half" that

were recorded and provided by FBI Salt Lake. These recorded sessions revealed images and videos of prepubescent boys and girls engaged in sexually explicit conduct that were posed by “665 and 1half” to include: Prepubescent boys performing oral sex on other prepubescent boys and adult males; Prepubescent boys masturbating; Prepubescent boys performing and receiving anal sodomy to/from other prepubescent boys and adult males; Prepubescent girls and boys engaged in penial vaginal intercourse; prepubescent boys and girls posing in sexually explicit positions. Other images of child pornography and links to dark web websites were also posted in the chatroom by other users, but the images described above are specifically from “665 and 1half.”

12. The IP address associated with Kik user “665and1half” was identified and through a subpoena, SA Welter was able to determine that the IP address belonged to Internet Service Provider (ISP) TDS Telecom (bendbroadband) and the subscriber using that IP address was Andrew Morrow who lived at an address on Indian Summer Road in Bend, Oregon. SA Welter was able to determine that there were three people living at the address: Andrew Morrow, his wife Krystne Morrow and their adult son, Pierce Morrow. SA Morrow was also able to determine that Pierce Morrow had an Iphone based on seflies he posted on his social media account in which you could see the Iphone.

13. SA Welter obtained a federal search warrant for the Morrow residence from the Honorable Thomas Coffin, United States Magistrate Judge. On January 18, 2018, Special Agents of the FBI and Deputy’s from the Deschutes County Sheriff’s Office executed the federal search warrant at the Indian Summer Road address where Pierce Morrow lives. During the search warrant, FBI Agents seized an Apple iPhone belonging to Pierce Morrow. A computer



forensic analysis of Pierce Morrow's phone revealed that the phone contained multiple images of prepubescent boys performing oral sex on other prepubescent boys, prepubescent boys performing oral sex on adult males, nude prepubescent boys and girls engaged in sexual acts and posed in sexually explicit positions, and naked prepubescent boys bound with a mask covering his eyes. There were over 7000 images on the phone most of which appear to be both adult and child pornography. Not all images have been reviewed in this initial preview. The forensic analysis of the iPhone also revealed that it was used to access Kik messenger account, user "665and1half."

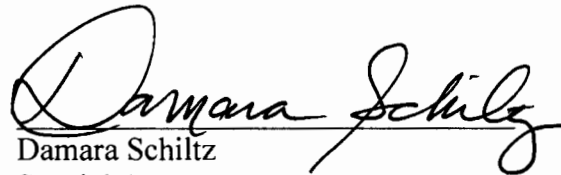
14. On January 18, 2018, Pierce Morrow was interviewed by SAs Travis Welter and Sean Kennedy, during that interview Pierce confessed that he posted 50-60 images and five videos of child pornography over the past two years to Kik Messenger through Kik user "665and1half." Pierce advised that he was blackmailed into collecting and distributing child pornography over the past approximately two years by an unknown individual or group of individuals operating on "Grinder." Pierce did not disclose this blackmail scheme to anyone and no one knew that he was in possession of child pornography. He could not provide any evidence of the blackmail and no evidence of the alleged blackmail found. While Pierce Morrow was registered on his family's Sprint Cellular service, he was the only person who had access to the above mentioned iPhone.

### **Conclusion**

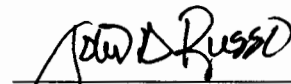
15. Based on the foregoing, I have probable cause to believe that Pierce Matthew Morrow committed violations of Title 18, United States Code, Sections 2252A (a)(2) and (a)(5)(B), receipt, distribution, and possession of child pornography. I therefore request that the

Court issue the requested criminal complaint and arrest warrant.

16. Prior to being submitted to the Court, this affidavit and the requested arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Amy Potter, and AUSA Potter advised me that in her opinion the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested complaint and warrant.

  
Damara Schiltz  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this 18<sup>th</sup> day of January 2018.

  
JOLIE RUSSO  
United States Magistrate Judge